

**SANTA MONICA MOUNTAINS CONSERVANCY**

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Agenda Item VIII  
MRCA  
7/3/13



December 5, 2011

Mr. Paul McCarthy  
Department of Regional Planning, Impact Analysis  
County of Los Angeles  
320 West Temple Street  
Los Angeles, California, 90012

**Comments On:**

**Notice of Consultation, Project NO. R2008-00284/RPPT200800190/RENV200900122,  
1809 Tuna Canyon Road, Topanga**

Dear Mr. McCarthy:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments and recommendations on the Notice of Consultation and draft Initial Study for the above-referenced proposed project. The subject property is bordered on the south by Dix Canyon Creek, and is bordered on the north by public open space owned by the Mountains Recreation and Conservation Authority (MRCA). This public open space was acquired by the MRCA in January of 2011 with County funding and support from the local community. The property is located within the Malibu Coastal Zone and is zoned for Light Agricultural uses. The current California Environmental Quality Act (CEQA) analysis is deficient not only for failing to mention a single specific mitigation measure for impacts that would result from this project, but it is also deficient for not addressing the site's proximity to public open space.

A development of the size and scale proposed would have considerable biological and aesthetic impacts for a single-family home. The combined footprint of the proposed residence, driveway, and associated structures (such as a recreation room) would exceed 16,000 square-feet, making this project one of the largest residences in an area with unique sandstone formations. The Cultural Resources section of the Initial Study acknowledges only that the project site contains rock outcroppings. It is deficient for not providing a single detail that supports the determination that the project would result in less than significant impacts in this regard. Likewise, no mitigation measures are given for the impacts to biota or aesthetics mentioned under Mandatory Findings of Significance.

The presence of State-listed Santa Susana Tarweed (*Deinandra minthornii*) was noted on the afore-mentioned public open space by MRCA staff in December of 2010. Has the proposed project site been surveyed for the presence of Santa Susana Tarweed?

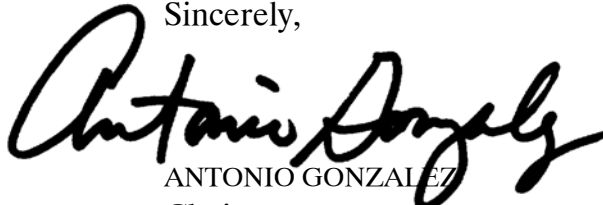
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The Conservancy recommends that the County require as a condition of approval for this project that the applicant dedicate a conservation easement to a public agency that encompasses the portion of the subject property located outside of the proposed development footprint. This conservation easement would include the Environmentally Sensitive Habitat Area located onsite. The entirety of the easement area should expressly prohibit fencing, lighting, grading, hardscape, facilities and planting of non-native vegetation. Said easement would expressly allow for Fire Department-required fuel modification and the cultivation and irrigation of native plants.

The Mountains Recreation and Conservation Authority is available to accept such an easement dedication if it is not desired by the County.

If you have any questions, please feel free to contact Paul Edelman of our staff at 310-589-3200, ext. 128, or by e-mail at [edelman@smmc.ca.gov](mailto:edelman@smmc.ca.gov). Thank you for your time and consideration.

Sincerely,



ANTONIO GONZALEZ  
Chairperson